

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE WACHOVIA EQUITY
SECURITIES LITIGATION

No. 08 Civ. 6171 (RJS)

ECF Case

**NOTICE OF LEAD PLAINTIFFS' MOTION FOR FINAL APPROVAL OF PROPOSED
CLASS SETTLEMENT AND PLAN OF ALLOCATION**

TO: All Counsel of Record

PLEASE TAKE NOTICE that pursuant to Federal Rules of Civil Procedure 23(e) and 23(h) and this Court's Order Preliminarily Approving Proposed Settlements and Providing for Notice dated August 9, 2011, and upon the Declaration of Ira M. Press in Support of Proposed Class Settlement, Plan of Allocation and Award of Attorneys' Fees and Expenses, dated April 27, 2012; the Memorandum of Law in Support of Lead Plaintiffs' Motion for Final Approval of Proposed Class Settlement and Plan of Allocation; and all other papers and proceedings herein, Lead Plaintiffs will and do hereby move this Court on June 1, 2012, at 11:00 a.m. in the Courtroom of the Honorable Richard J. Sullivan, United States District Judge for the Southern District of New York, United States Courthouse, 500 Pearl Street, New York, New York 10007, or other such location and time as set by the Court, for entry of a Judgment approving the Settlements as fair, reasonable and adequate and for entry of an Order approving the proposed Plan of Allocation as fair and reasonable.

Dated: April 27, 2012

Respectfully Submitted,

KIRBY McINERNEY LLP

By: /s/ Ira M. Press
Ira M. Press
Andrew S. McNeela
Sarah G. Lopez
Beverly Tse Mirza
825 Third Avenue, 16th Floor
New York, NY 10022
Tel: (212) 371-6600
Fax: (212) 751-2540
Lead Counsel for Lead Plaintiffs